

JAN 28 2003

Christine Kump-Mitchell, P.E.
Environmental Engineer-Permits Section
Missouri Department of Natural Resources
Hazardous Waste Program
7545 S. Lindbergh, Suite 210
St. Louis, MO 63125

Dear Ms. Kump-Mitchell:

RE: Review of the Corrective Action Indoor Air Quality Assessment (December 2002)
Modine Manufacturing Company
Camdenton, Missouri
EPA RCRA ID#MOD062439351

The Environmental Protection Agency (EPA) has reviewed the Corrective Action Indoor Air Quality Assessment for Modine Manufacturing Company (Modine), Camdenton, Missouri. Below, I have provided my comments on the document.

Comments

1. As recommended by the "Draft Subsurface Vapor Intrusion Guidance," dated November 2002, background sources to indoor air contamination should be considered in the investigation. Modine should identify any sources of volatile organic compounds (VOC) not related to subsurface contamination through an inspection of the plant. In addition, ambient outdoor air samples should be collected in conjunction with any indoor air samples.
2. Factors, such as indoor and outdoor pressure differences, temperature, depth to groundwater, air exchange rate, etc., may influence subsurface vapor intrusion and indoor air contamination. Given the day-to-day variability and uncertainties associated with these factors, a one time sampling event will not be representative of the average levels of indoor air VOCs over the long-term. Therefore, it is strongly recommended that multiple rounds of air sampling be conducted to accurately assess indoor air contamination.

If you have any questions or need clarifications on our comments, you may contact me at (913) 551-7159.

Sincerely,



David Garrett
Environmental Scientist
RCRA Corrective Actions and Permits Branch
Air, RCRA, and Toxics Division

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RCAP
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RCRA RECORDS CENTER



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

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